

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Multi-Association Group (MAG) Plan for	)	CC Docket No. 00-256
Regulation of Interstate Services of Non-Price	)	
Cap Incumbent Local Exchange Carriers and	)	
Interexchange Carriers	)	
	)	
Federal-State Joint Board on Universal	)	CC Docket No. 96-45
Service	)	
	)	
Access Charge Reform for Incumbent Local	)	CC Docket No. 98-77
Exchange Carriers Subject to Rate-of-Return	)	
Regulation	)	
	)	
Prescribing the Authorized Rate of Return for	)	CC Docket No. 98-166
Interstate Services of Local Exchange Carriers	)	

**COMMENTS OF THE RURAL CONSUMER CHOICE COALITION  
ON THE PETITION OF NECA, ET AL. FOR RECONSIDERATION  
AND/OR CLARIFICATION**

The Rural Consumer Choice Coalition (“RCC Coalition”) and its members AT&T, General Communication Inc. and Western Wireless Co., hereby comment with respect to the joint petition for reconsideration and/or clarification of the *MAG Order*<sup>1</sup> filed by the National Exchange Carrier Association, National Rural Telecom Association, the Organization for the

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<sup>1</sup> *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers; Federal-State Joint Board on Universal Service; Access Charge Reform for Incumbent Local Exchange Carriers Subject to Rate-of-Return Regulation; Prescribing the Authorized Rate of Return for Interstate Services of Local Exchange Carriers*, Second Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket Nos. 98-77 and 98-166, FCC 01-304 (“*MAG Order*” or “*Order*”).

Promotion and Advancement of Small Telecommunications Companies and the United States Telecom Association (collectively “Joint Petitioners”).<sup>2</sup>

The RCC Coalition agrees that rule 54.903 needs to be modified to collect not just common line revenue requirement information, but also information with respect to actual and projected common line revenues. The Commission must take care to draft the rule so that any voluntary reductions of SLC charges – to the extent those are ever authorized – do not increase the amount of Interstate Common Line Support (ICLS). In addition, because excessively long deadlines for submission of actual revenue requirements and revenue data add regulatory uncertainty for eligible CLECs (who are not privy to the ILEC’s information, but whose support payments are dependent upon that information), the Commission should ensure that such information is submitted as quickly as is reasonably feasible. Joint Petitioners have proposed to give ILECs a full year to submit that data, which is unduly long.

In addition to truing up the ILEC support based on revenue requirements and actual revenues, the Commission should also true up the CLEC support per line based on the ILEC’s actual line counts for the quarter. This could be done using either the lines on the day preceding the start of the quarter for which support is to be paid (which will be reported six months after the close of that quarter), or the simple average for the quarter (which could be computed based on the reported lines on the day preceding the start of the quarter and the reported lines served on the last day of the quarter).

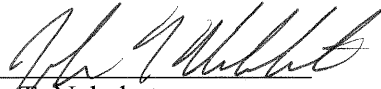
Finally, as the Commission continues to move forward to implement the ICLS, it should ensure that carriers receive support for the lines they actually serve during a quarter, not just

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<sup>2</sup> Petition for Reconsideration and/or Clarification filed by the National Exchange Carrier Association, Inc., the National Rural Telecom Association, the Organization for the Promotion and Advancement of Small Telecommunications Companies, and the United States Telecom Association (dated December 31, 2001), CC Docket Nos. 00-256, 96-45, 98-77 & 98-166.

based on the historic line counts available at the start of that quarter. Failure to include such a true-up would mean that a carrier losing a line (whether CLEC or ILEC) would continue to receive support for up to six months after it no longer provided service, and a carrier adding a line would provide service for up to six months before beginning to receive universal service support. We believe the Commission does not need to adopt a rule change in order to have USAC implement such a true-up.

Respectfully submitted,



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February 14, 2002

## CERTIFICATE OF SERVICE

I, Timothy Simeone, hereby certify that a copy of the foregoing Comments of the Rural Consumer Choice Coalition on the Petition of NECA, et al. for Reconsideration and/or Clarification was served this 14<sup>th</sup> day of February, 2002 via hand-delivery or fax, for the parties indicated with an \*, and by first-class mail, postage prepaid for all other parties:

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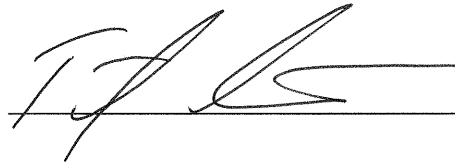
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